

JOLLENTA PLUMMER, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

TMC RESTAURANT OF CHARLOTTE,
LLC dba MEN’S CLUB OF CHARLOTTE,
a North Carolina Limited Liability Company;
LLOYD J ACE, III, an individual; ABDUR
RASCHID CHAWDHARY, an individual;
DOE MANAGERS 1 through 3; and DOES 4
through 10, inclusive,

Defendants.

Case No.: 3:21-cv-00648-FDW-DSC

COLLECTIVE ACTION

**PLAINTIFF KIRSTEN
CAVANAUGH’S NOTICE OF
ACCEPTANCE OF DEFENDANTS’
FED. R. CIV. P. 68 OFFER OF
JUDGMENT**

1. Cavanaugh joined this matter on December 22, 2021. *See* Dkt. 10.
2. On July 5, 2022, this Court issued its Order Granting Joint Motion to Stay Claims of Plaintiff Kirsten Cavanaugh Pending Arbitration and stayed Plaintiff's claims. *See* Dkt. 16.
3. On July 11, 2022, Defendants served Plaintiff with a Fed. R. Civ. P. 68 Offer of Judgment in this action in the amount of \$6,000, inclusive of Plaintiff's attorneys' fees and costs. *See* Exhibit 1.

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4. Pursuant to Fed. R. Civ. P. 68, Plaintiff timely serves written notice of her acceptance of the offer via the Court's CM/ECF electronic filing system to Defendants' attorneys of record.

Dated: July 11, 2022

Respectfully submitted,

/s/ Jesenia A. Martinez
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*Attorneys for Plaintiffs and all others
similarly situated*

CERTIFICATE OF SERVICE

I certify that on Monday, July 11, 2022 a true and correct copy of the attached **PLAINTIFF KIRSTEN CAVANAUGH'S NOTICE OF ACCEPTANCE OF DEFENDANTS' FED. R. CIV. P. 68 OFFER OF JUDGMENT** and accompanying document were served via CM/ECF upon the following parties pursuant to Rule 5 of the Federal Rules of Civil Procedure:

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Counsel for All Defendants

/s/ Jesenia A. Martinez

Jesenia A. Martinez